

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**IN RE IGLOO PRODUCTS COOLER
RECALL LITIGATION**

Civil Action No.: 1:25-cv-00298-JLH-EGT

CONSOLIDATED

**STIPULATION AND [PROPOSED] ORDER SETTING SCHEDULE AND EXPANDING
PAGE LIMITATIONS FOR MOTION TO DISMISS BRIEFING**

WHEREAS, Plaintiffs filed the Consolidated Class Action Complaint (“Consolidated Complaint”) on October 21, 2025 (D.I. 58);

WHEREAS, Defendant Igloo Products Corporation (“Defendant”) anticipates filing a motion to dismiss the Consolidated Complaint on or before the November 20, 2025 deadline to respond (D.I. 30—permitting Defendant to respond to the Consolidated Complaint 30 days after filing);

WHEREAS, the Consolidated Complaint is brought by six named Plaintiffs, alleges 13 causes of action, and invokes the laws of multiple jurisdictions. Moreover, Defendant anticipates raising arguments under both Federal Rules 12(b)(1) and 12(b)(6) in its forthcoming motion to dismiss. Accordingly, to properly address each of the grounds for relief that Defendant anticipates raising, including as to each claim raised by each Plaintiff under each of the applicable laws, Defendant requires additional pages for its motion to dismiss beyond the amount ordinarily permitted under the Local Rules; and

WHEREAS, although the parties previously stipulated to a briefing schedule on Defendant’s anticipated motion to dismiss that was subsequently entered by the Court, the stipulation did not include a deadline for Defendant’s reply in support of the motion to dismiss.

WHEREAS, the parties have conferred and have agreed, subject to the Court’s approval, on the following briefing schedule, and that an expansion of the page limitations on Defendant’s anticipated motion to dismiss is appropriate under the circumstances.

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that pursuant to D. Del. LR 7.1.2(b) and 7.1.3(a)(4):

- 1) Defendant's reply in support of its forthcoming motion to dismiss shall be due twenty-one (21) days after the deadline for Plaintiffs' opposition to the motion; and
- 2) The page limitations for the parties briefing on Defendant's forthcoming motion to dismiss is expanded to 40 pages for each of the opening and answering briefs, and to 20 pages for the reply brief.

Dated: October 31, 2025

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SO ORDERED this _____ day of _____ 2025.

UNITED STATES MAGISTRATE JUDGE